

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

---

SAMSUNG ELECTRONICS CO., LTD.,	:	
SAMSUNG ELECTRONICS AMERICA, INC.,	:	
SAMSUNG TELECOMMUNICATIONS	:	
AMERICA GENERAL, L.L.C.,	:	
SAMSUNG SEMICONDUCTOR, INC., and	:	
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,	:	
Plaintiffs,	:	Civil Action No. 06-CV-0720 (****)
v.	:	
ON SEMICONDUCTOR CORP.	:	
and	:	
SEMICONDUCTOR COMPONENTS	:	
INDUSTRIES, LLC,	:	
Defendants.	:	

---

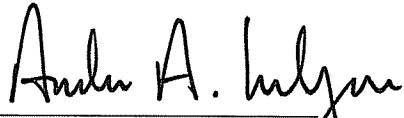
**PLAINTIFFS' MOTION TO ENJOIN DEFENDANTS  
FROM PURSUING A DUPLICATIVE TEXAS ACTION**

Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America General, L.L.C., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C. hereby move this Court, pursuant to the first-filed rule, to enjoin Defendants ON Semiconductor Corp. and Semiconductor Components Industries, LLC from pursuing, prosecuting, or otherwise proceeding with a duplicative action filed by Defendants in the United States District Court for the Eastern District of Texas, Case. No. 6:06 cv 523. The

bases of this motion are fully set forth in Plaintiffs' opening brief and the supporting declaration of Patrick Muir, filed contemporaneously herewith.

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion to enjoin.

Respectfully submitted,



Josy W. Ingersoll (No. 1088)

*jingersoll@ycst.com*

John W. Shaw (No. 3362)

*jshaw@ycst.com*

Andrew A. Lundgren (No. 4429)

*alundgren@ycst.com*

YOUNG CONAWAY STARGATT & TAYLOR, LLP

The Brandywine Building

1000 West Street

P.O. Box 391

Wilmington, Delaware 19899-0391

(302) 571-6600

OF COUNSEL:

John M. Desmarais

James E. Marina

KIRKLAND & ELLIS LLP

153 East 53<sup>rd</sup> Street

New York, New York 10022-4675

(212) 446-4800

Dated: December 21, 2006

*Attorneys for Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America General, L.L.C., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C.*

**CERTIFICATE OF SERVICE**

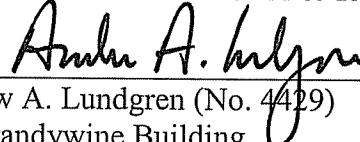
I, Andrew A. Lundgren, Esquire, hereby certify that on December 21, 2006, the foregoing document was electronically filed with the Clerk of the Court using CM/ECF and served upon the defendants' registered agent as indicated below:

**BY HAND DELIVERY**

ON Semiconductor Corporation  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

Semiconductor Components Industries, LLC  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Andrew A. Lundgren (No. 4429)  
The Brandywine Building  
1000 West Street  
Wilmington, DE 19801  
302-571-6600  
[alundgren@ycst.com](mailto:alundgren@ycst.com)